

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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PETER OPPENEER
CLERK US DIST COURT
WD OF WI

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. 14-cr-27-WMC

26 U.S.C. 7206(1)

31 U.S.C. 5324(a)(3)

JARED JEROME HART,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about April 15, 2009, in the Western District of Wisconsin, the defendant,

JARED JEROME HART,

a resident of Eau Claire, Wisconsin, willfully made and subscribed a Corporation Income Tax Form, Form 1120S, on behalf of J&L Corporation of Eau Claire, d.b.a The Pickle Bar, for the calendar year 2008, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which he did not believe to be true and correct as to every material matter, in that he reported on Line 1a that gross receipts for The Pickle Bar for calendar year 2008 were \$ 662,255, whereas, as he then knew and believed, the gross receipts for calendar year 2008 substantially exceeded \$ 662,255.

(In violation of Title 26, United States Code, Section 7206(1)).

COUNT 2

On or about March 15, 2010, in the Western District of Wisconsin, the defendant,

JARED JEROME HART,

a resident of Eau Claire, Wisconsin, willfully made and subscribed a Corporation Income Tax Form, Form 1120S, on behalf of J&L Corporation of Eau Claire, d.b.a The Pickle Bar, for the calendar year 2009, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which he did not believe to be true and correct as to every material matter in that he reported on Line 1a that gross receipts for The Pickle Bar for calendar year 2009 were \$ 727,240, whereas, as he then knew and believed, the gross receipts for calendar year 2009 substantially exceeded \$ 727,240.

(In violation of Title 26, United States Code, Section 7206(1)).

COUNT 3

On or about March 15, 2011, in the Western District of Wisconsin, the defendant,

JARED JEROME HART,

a resident of Eau Claire, Wisconsin, willfully made and subscribed a Corporation Income Tax Form, Form 1120S, on behalf J&L Corporation of Eau Claire, d.b.a The Pickle Bar, for the calendar year 2010, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which he did not believe to be true and correct as to every material matter, in that he reported on Line 1a that gross receipts for The Pickle Bar for calendar year

2010 were \$ 746,595, whereas, as he then knew and believed, the gross receipts for calendar year 2010 substantially exceeded \$ 746,595.

(In violation of Title 26, United States Code, Section 7206(1)).

COUNT 4

On or about March 15, 2012, in the Western District of Wisconsin, the defendant,

JARED JEROME HART,

a resident of Eau Claire, Wisconsin, willfully made and subscribed a Corporation Income Tax Form, Form 1120S, on behalf J&L Corporation of Eau Claire, d.b.a The Pickle Bar, for the calendar year 2011, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which he did not believe to be true and correct as to every material matter in that he reported on Line 1a that gross receipts for The Pickle Bar for calendar year 2011 were \$ 827,577, whereas, as he then knew and believed, the gross receipts for calendar year 2011 substantially exceeded \$ 827,577.

(In violation of Title 26, United States Code, Section 7206(1)).

Title 31, United States Code, Section 5324

COUNT 5

From on or about January 1, 2008, to in or about December 2011, in the Western District of Wisconsin, the defendant,

JARED JEROME HART,

while knowing that domestic financial institutions are required to report currency transactions in amounts over \$ 10,000, structured and attempted to structure financial

transactions involving a domestic financial institution, namely Charter Bank, for the purpose of evading the reporting requirement.

(In violation of Title 31, United States Code, Section 5324(a)(3)).

FORFEITURE ALLEGATION

1. As a result of the offense charged in Count 5 of this indictment, and upon conviction for violating Title 31, United States Code, Section 5324(a)(3), pursuant to Title 31, United States Code, Section 5317, the defendant,

JARED JEROME HART,

shall forfeit to the United States of America all property, real or personal, involved in the offense and any property traceable to such property. The property to be forfeited includes \$1.6 million in United States Currency.

2. If the property described above, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31,

United States Code, Section 5317(c) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL

James M. Whitcomb
PRESIDING JUROR

John W. Vaudreuil
JOHN W. VAUDREUIL
United States Attorney

Indictment returned: 2/19/2014